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Attorney for Plaintiffs and Putative Class

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

Deborah Howington, James Perry,
Elena Huizar, Lacey Bostick, Modupe
Adesemoye, Marc Popisteanu, Nicole
Carrier, Michael Winn, Edward
McKinley, Wendy Lara Prieto, Luis
Zepeda, Phillip Sterbinsky, Samuel
Langley, Kevin Driggs, Michelle
Bernardo, Victoria Teixeira, Antonio
Fisher, Jyni Wyse, Marcus Hernandez,
Hunter Haley, Mark Lindley, Terrence
Holmes, David Amiri, Alex Vonica,
Kerrick Brookins, Ronald Bruner,
Rosalie Kitagawa, and Cody Block,

Plaintiffs,

v.

Taiwan Semiconductor Manufacturing
Co. Ltd., TSMC North America, TSMC
Technology, Inc., TSMC Arizona
Corporation and TSMC Washington,
LLC,

Defendants.

Case No. 5:24-cv-5684-VKD

**NOTICE OF CONSENT TO FILE
SECOND AMENDED COMPLAINT
ADDING TITLE VII CLAIMS ON
BEHALF OF CERTAIN
PLAINTIFFS**

1 Plaintiffs hereby provide notice that, pursuant to Fed. R. Civ. P. 15(a)(2),
2 Defendants have consented, in writing, to amendment of the concurrently filed Second
3 Amended Complaint, allowing the following amendments to the pleading: (1) adding
4 Title VII claims on behalf of Plaintiffs Michelle Bernardo, Victoria Teixeira, Antonio
5 Fisher, Jyni Wyse, Marcus Hernandez, Mark Lindley, Terrence Holmes, David Amiri,
6 and Rosalie Kitagawa who exhausted their Title VII administrative remedies during
7 the pendency of Plaintiffs' Motion for Leave to Amend (Dkt. 37) by filing Charges of
8 Discrimination with the Equal Employment Opportunity Commission against TSMC,
9 and receiving a Notice of Right to Sue; and (2) changing the references to "Mr. Joy"
10 to "Ms. Joy" in Paragraphs 296, 297, and 298 of the Second Amended Complaint.
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16 DATED: June 30, 2025

Respectfully submitted,

17 By: /s/Daniel Low

18 Daniel Low, SBN 218387

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